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# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: 15-15969 ELF Elaine Jones

Chapter 13 Proceeding

Debtor(s)

Related to Document #50&51:

WELLS FARGO BANK, N.A.

v.

Movant

Hearing Date: 11/03/2016 at 10:00am

Elaine Jones and

William C. Miller, Esquire

Respondents

# **CERTIFICATE OF NO RESPONSE** TO MOTION FOR RELIEF

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on October 5, 2016 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than 10/20/2016.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted, POWERS KIRN & ASSOCIATES, LLC

By: \_/s/ Jill Manuel-Coughlin, Esquire

> By: Jill Manuel-Coughlin Attorney ID # 63252 Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053 Telephone: 215-942-2090 Facsimile: 215-942-8661 E-mail: Jill@pkjllc.com Attorney for Movant

DATED: October 26, 2016

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15-2271

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
Elaine Jones

Debtor(s)

WELLS FARGO BANK, N.A.

V.
Elaine Jones and
William C. Miller, Esquire

15-15969 ELF
Chapter 13 Proceeding
Hearing Date: 11/03/2016 at 10:00am

#### CERTIFICATION OF SERVICE AND NOTICE

Respondents

JILL MANUEL-COUGHLIN, counsel WELLS FARGO BANK, N.A., hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on October 26, 2016:

## **Served Electronically**:

Brad J. Sadek, Esquire 1315 Walnut Steet, Suite 804 Philadelphia,, PA 19107 Attorney for Debtor(s) William C. Miller, Esquire 1234 Market Street, Suite 1813 Philadelphia PA 19107 Trustee

## Served Via 1st Class Mail:

## POWERS KIRN & ASSOCIATES, LLC

By: /s/ Jill Manuel-Coughlin, Esquire

By: Jill Manuel-Coughlin Attorney ID # 63252 Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090 Facsimile: 215-942-8661 E-mail: Jill@pkjllc.com Attorney for Movant